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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERRY CHI,

Plaintiff

vs.

CLARK COUNTY SCHOOL DISTRICT, et
al.,

Defendants

Case No.: 2:24-cv-02014-CDS-BNW
**Order Approving Stipulation to
Extend Briefing Schedule**

[ECF No. 27]

1 Plaintiff TERRY CHI, by and through her attorney Robert P. Spretnak, Esq.; Defendants
 2 CLARK COUNTY SCHOOL DISTRICT, a political subdivision of the State of Nevada; MARY
 3 “MARE” MAZUR, in her official capacity and in her individual capacity; CEDRIC COLE, in his
 4 official capacity and in his individual capacity; JESUS JARA, in his official capacity; and
 5 BRENDA LARSEN-MITCHELL, in her official capacity, by and through their attorneys Ethan D.
 6 Thomas, Esq., Diana G. Dickinson, Esq., and Luke W. Molleck, Esq.; and Defendant SOUTHERN
 7 NEVADA PUBLIC TELEVISION, a Nevada nonprofit corporation, by and through its attorneys
 8 Rusty Graf, Esq., and Paul E. Larsen, Esq.; do hereby stipulate and agree to extend the deadline for
 9 Plaintiff TERRY CHI to file her points and authorities in opposition to the following motions to
 10 dismiss: (1) Defendants Clark County School District, Mary “Mare” Mazur, Cedric Cole, Jesus Jara,
 11 and Brenda Larsen-Mitchell’s Partial Motion To Dismiss [ECF No. 22]; and (2) Defendant Southern
 12 Nevada Public Television’s Motion To Dismiss [ECF No. 24]. The first motion to dismiss, ECF No.
 13 22, was filed on January 10, 2025, and, therefore, pursuant to LR 7-2(b), the current deadline for the
 14 opposition to that dispositive motion is **January 24, 2025**. The second motion to dismiss, ECF No.
 15 24, was filed on January 14, 2025, and, therefore, pursuant to LR 7-2(b), the current deadline for the
 16 opposition to that dispositive motion is **January 28, 2025**. Ms. Chi asks that the deadline for
 17 responding to these two motions to dismiss be extended to **February 28, 2025**. This is the first
 18 request to extend the time for filing points and authorities in opposition to these motions to dismiss.

19 There is good cause for this extension.

20 In the period of since the first of these two motions was filed, the work schedule for the
 21 attorney for Ms. Chi has been completely filled. Ms. Chi’s attorney is a solo practitioner. He has
 22 had to attend two full-day depositions. He has had to review due of a substantial number of
 23 documents retrieved from a client cell phone, which must reviewed carefully for privilege and
 24 relevance, in a matter pending in the Clark County District Court. He has two mediations this week:
 25 (1) an Early Neutral Evaluation in the matter of *Marsadie Lewis v. Uzma Zafar, MD, P.C.*, Case No.
 26 2:24-cv-00001-JCM-EJY, scheduled for January 23, 2025; and (2) an Inmate Early Mediation, for

1 which Mr. Spretnak is the court-appointed mediator, in the matter of *Thomas Rios v. Officer Griffen*,
2 Case No. 2:24-CV-01184-APG-BNW, set for January 24, 2025. Ms. Chi's counsel has two court
3 complaints, and one non-dispositive motion, that must be filed before the end of this month. Also,
4 in a related matter pending in the Clark County District Court, counsel must file oppositions to three
5 other dispositive motions recently filed in the matter of *Terry Chi v. Mary "Mare" Mazur; Debra*
6 *Solt; Douglas Bradford; Michele Kane; and Sun City Anthem Community Association, Inc., a*
7 *Nevada non-profit corporation*, Case No. A-24-901963-C, for which extensions of time also are
8 being sought.

9 The length of time for the extension is further necessitated by the fact that counsel for Ms.
10 Chi is scheduled to be on vacation, out of the country, from January 28, 2025, to February 11, 2025,
11 for a trip that has been postponed once and cannot be postponed or cancelled without incurring a
12 substantial expense.

13 Moreover, counsel has been generous with extending deadlines for the defendants in this case
14 as well as to the defendants in the related case pending in the Clark County District:

15 1. Defendant Clark County School District was served on November 15, 2024. *See*
16 *Affidavit of Service*, ECF No. 10. Pursuant to the Stipulation To Extend Time For Defendants Clark
17 County School District, Mary "Mare" Mazur, Cedric Cole And Brenda Larsen-Mitchell To File
18 Responses To Plaintiff's Complaint, ECF. No. 16, the response deadline for this defendant was
19 extended from December 6, 2024, to January 10, 2025.

20 2. Defendant Brenda Larsen-Mitchell was served on November 15, 2024. *See Affidavit*
21 *of Service*, ECF No. 11. Pursuant to ECF No. 16, the response deadline for this defendant was
22 extended from December 6, 2024, to January 10, 2025.

23 3. Defendant Cedric Cole was served on November 19, 2024. *See Affidavit of Service*,
24 ECF No. 13. Pursuant to ECF No. 16, the response deadline for this defendant was extended from
25 December 10, 2024, to January 10, 2025.

26 4. Defendant Mary "Mare" Mazur was served on November 19, 2024. *See Affidavit*
27 *of Service*, ECF No. 14. Pursuant to ECF No. 16, the response deadline for this defendant was
28 extended from December 10, 2024, to January 10, 2025.

1 5. Defendant Southern Nevada Public Television was served on November 19, 2024.
2 *See* Affidavit of Service, ECF No. 12. Pursuant to the Stipulation To Extend Time For Defendant
3 Southern Nevada Public Television To File Response To Plaintiff's Complaint, ECF. No. 18, the
4 response deadline for this defendant was extended from December 10, 2024, to January 10, 2025.

5 Therefore, for the reasons set forth above, Plaintiff Terry Chi asks for an extension of time
6 to file her points and authorities in opposition to the two pending motions to dismiss.

7 Moreover, the parties further stipulate that defendants shall have an additional two weeks to
8 file their respective reply briefs. Under LR 7-2(b), reply briefs ordinarily would be seven days after
9 the filing of an opposition brief. Thus, in light of the aforementioned extension for Plaintiff Terry
10 Chi to file her points and authorities in opposition to the two pending motions to dismiss, any reply
11 brief in support of either motion would be due on March 7, 2025.

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1 The parties agree that the defendants have until March 21, 2025, to file their respective reply
2 briefs in support of their motions to dismiss.

3
4 DATED: January 22, 2025.

DATED: January 22, 2025.

5 LAW OFFICES OF ROBERT P. SPRETNAK

LITTLER MENDELSON, P.C.

6 By: /s/ Robert P. Spretnak
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By: /s/ Luke W. Molleck
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9 Attorney for Plaintiff Terry Chi

10 Attorneys for Defendants Clark County School
11 District, Mary "Mare" Mazur, Cedric Cole,
Jesus Jara, and Brenda Larsen-Mitchell

12 DATED: January 22, 2025.

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14 By: /s/ Paul E. Larsen
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19 Public Television

20
21 Based on the parties' stipulation, the deadline for plaintiff to respond to the motions to
22 dismiss is extended to February 28, 2025; and the defendants have until March 21, 2025, to
23 file their respective reply briefs in support of their motions to dismiss.

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25 
26 UNITED STATES DISTRICT JUDGE

27 Dated: January 23, 2025